

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division

Angela Hennigan,

*Debtor.*

Chapter 13  
Case No. 22-12508

**Motion to Modify Plan After Confirmation**

Debtor Angela Hennigan, by her attorney, moves this Court as follows:

1. The Debtor's plan was confirmed on January 11, 2023.
2. The Debtor requests that the Court enter an order approving the modified plan filed at ECF No. 43 as the new confirmed plan.
3. The proposed plan provides for the surrender of the Debtor's 2015 Dodge Durango and payment recently incurred attorney fees.
4. The Debtor has filed supplemental Schedules I and J that demonstrate that this plan is feasible.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 1, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: 

Mike Assad (#330937)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com